

Exhibit E

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

OCLC, Inc.,

Plaintiff,

v.

**CLARIVATE, PLC; CLARIVATE
ANALYTICS (US) LLC; PROQUEST
LLC; and EX LIBRIS (USA), INC.,**

Defendants.

Case No. 2:22-cv-2470-JLG-KAJ

Judge James L. Graham

Magistrate Judge Kimberly A. Jolson

NOTICE OF DEPOSITION

Pursuant to Federal Rule of Civil Procedure 30(b)(6), counsel for Plaintiff OCLC, Inc. (“OCLC”) will take the deposition of the designated representative(s) of Defendants Clarivate, Plc, Clarivate Analytics (US) LLC, ProQuest LLC, and/or Ex Libris (USA), Inc. beginning at 9:00 a.m. on June 28, 2022 at a location agreed upon by the parties. OCLC will take the deposition of the designated representative(s) on the matters below and on reasonably related matters from day to day until completed. The deposition will be taken before an officer appointed or designated to administer oaths and will be transcribed by stenographic means. This deposition is being taken for the purposes of discovery, for use at the preliminary injunction hearing, for use at trial, or for such other purposes as are permitted under the Federal Rules of Civil Procedure and the local rules.

MATTERS UPON WHICH TESTIMONY IS SOUGHT

1. Defendants’ corporate structure, including Defendants’ subsidiaries, affiliates, and related entities and those entities’ involvement in the development, strategy, marketing, design, operation, implementation, and/or oversight of MetaDoor;

2. Agreements, contracts, terms, and/or consent forms provided to and/or executed by Defendants and OCLC WorldCat® Customers/Members related to MetaDoor, including the MetaDoor Consent Form;

3. OCLC WorldCat® Customers/Members that have downloaded, linked to, uploaded, and/or otherwise transferred their bibliographic records and/or associated metadata to Defendants and/or MetaDoor;

4. The agreements between Defendants and MetaDoor's Development Partners, and the Development Partners' involvement, participation, and contribution related to the development, strategy, marketing, design, operation, implementation, and/or oversight of MetaDoor, including University of Minnesota, Southern Methodist University, Brandeis University, University of Delaware, Swiss Library Service Platform, the National Library of Israel, Washington Research Library Consortium and its individual partners, Florida Gulf Coast University, and the University of Tennessee – Chattanooga;

5. The design and operation of MetaDoor, including how records, bibliographic information, and/or metadata are submitted to, merged to, linked to, uploaded to, transferred to, indexed, scored, and/or used by MetaDoor.

Dated: June 13, 2022

Respectfully submitted,

/s/ Traci L. Martinez

Traci L. Martinez (0083989), Trial Attorney
Jeffrey M. Walker (0096567)
Kathryn M. Brown (0100426)
SQUIRE PATTON BOGGS (US) LLP
2000 Huntington Center
41 South High Street
Columbus, Ohio 43215
Telephone: +1 614 365 2700
Facsimile: +1 614 365 2499
traci.martinez@squirepb.com

jeffrey.walker@squirepb.com
kathryn.brown@squirepb.com

Attorneys for Plaintiff OCLC, Inc.

CERTIFICATE OF SERVICE

On June 13, 2022, this document was filed electronically with the Clerk of the United States District Court for the Southern District of Ohio, Eastern Division, which will electronically serve a copy of the foregoing on all counsel of record for all parties. Additionally, this document was sent by email to the following counsel for Defendant and will be served upon the parties with the summons and complaint in this matter:

Brian S. Weinstein
Davis Polk & Wardell LLP
450 Lexington Avenue
New York, New York 10017
brian.weinstein@davispolk.com

Ashok Ramani
Davis Polk & Wardell LLP
1600 El Camino Real
Menlo Park, California 94025
ashok.ramani@davispolk.com

/s/ Traci L. Martinez
One of the Attorneys for Plaintiff